

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Boston Edison Company	)	D.T.E. 01-78
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**REPLY OF BOSTON EDISON COMPANY TO MOTION  
OF THE MWRA FOR SUSPENSION AND INVESTIGATION  
OF THE PROPOSED RATE WR, TARIFF M.D.T.E. NO. 974**

Boston Edison Company ("Boston Edison" or the "Company") has reviewed the motion of the Massachusetts Water Resources Authority ("MWRA") seeking to suspend the Company's proposed Rate WR, M.D.T.E. No. 974, that was filed on December 14, 2001, for effect on January 1, 2002. Boston Edison continues to believe that the proposed M.D.T.E. No. 974 is the appropriate tariff for Rate WR, effective January 1, 2002 for all of the reasons stated in the filing letter accompanying said tariff and notwithstanding the MWRA's arguments to the contrary. Moreover, the Company believes that the offer to collect such rate subject to refund represents a reasonable interim resolution of the matter pending further Department review and investigation.

Notwithstanding the foregoing, and as an alternative to implementing M.D.T.E. No. 974 subject to refund, the Company does not oppose the requested suspension of M.D.T.E. No. 974; provided that in the interim the previously proposed M.D.T.E. No. 960 is placed into effect, effective January 1, 2002;<sup>1</sup> and, in reliance upon the understanding between the parties stated in the October 31, 2001 "Standstill Agreement,"

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<sup>1</sup> In the December 14, 2001 letter accompanying the filing of M.D.T.E. No. 974, the Company withdrew the previously filed M.D.T.E. No. 960. Should the Department determine that the appropriate action is to suspend M.D.T.E. No. 974, then the Company hereby rescinds its withdrawal of M.D.T.E. No. 960 (or, should the Department determine it to be preferable from an administrative standpoint, the Company offers to re-file said M.D.T.E. No. 960, for effect pending the resolution of the suspension of M.D.T.E. No. 974).

that the Department's eventual determination as to the proper methodology for the post-standard offer Rate WR is applied retroactively. The Company would further urge that the period of any suspension be as short as reasonably possible so as to permit the Department's investigation of this matter, and to avoid undue uncertainty as to the proper amounts ultimately due under Rate WR.

Respectfully Submitted,

BOSTON EDISON COMPANY

By its attorneys,

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